

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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<b>UNITED AIR LINES, INC.,</b>	)	
Plaintiff,	)	Case No. 08-cv-3337
v.	)	Hon. James B. Moran
<b>THE CITY OF LOS ANGELES and LOS ANGELES WORLD AIRPORTS,</b>	)	Magistrate Judge Sidney I. Schenkier
<b>Defendants.</b>	)	

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**INSTANTER MOTION FOR LEAVE TO FILE  
OBJECTIONS IN EXCESS OF 15 PAGES**

The City of Los Angeles (the “City”), by and through its Department of Airports, also known as the Los Angeles World Airports (“LAWA”) (the City and LAWA are collectively referred to herein as the “City”), respectfully submit this motion for leave, *instanter*, to file Objections by the City of Los Angeles to the Bankruptcy Court’s Memorandum of Decision in excess of the page limitation set forth in Local Rule 7.1, or any other applicable rule, to the extent any such rules are applicable. In support of this motion, the City states as follows:

1. This lawsuit stems from the Chapter 11 bankruptcy petition filed by United Airlines, Inc. (“UAL”) and from an adversary proceeding UAL commenced against the City on or about December 30, 2005 (the “Adversary Proceeding”).
2. In the Adversary Proceeding, UAL seeks, *inter alia*, to enforce its purported contractual rights to operate turboprop airplanes from Terminal 8 at Los Angeles International Airport (“LAX”). The City contends that, for reasons of safety and efficiency, it may prohibit

the operation of turboprop airplanes from Terminal 8 by virtue of its regulatory authority over the operations at LAX.

3. On May 31, 2008, the Bankruptcy Court entered a Memorandum of Decision (“MoD”) recommending that this Court issue a permanent injunction that would prevent the City from enforcing its prohibition on turboprop operations at Terminal 8.

4. The City is filing concurrently herewith Objections by the City of Los Angeles to the Bankruptcy Court’s Memorandum of Decision (“Objections”). In the Objections, the City asks this Court to reject certain of the Bankruptcy Court’s proposed findings of fact and conclusions of law and to dissolve the injunction pending its review of the MoD.

5. To the extent the page limits set forth in Local Rule 7.1, or any other rule, are applicable to the Objections, the City respectfully requests leave, *instanter*, to file its Objections notwithstanding any such page limitations in order to provide the Court will a full and fair explanation of this complex dispute and the basis for the relief the City requests.

WHEREFORE, the City respectfully requests that this Court enter an order granting the City *instanter* leave to file the Objections in excess of 15 pages.

Dated: June 30, 2008

Respectfully submitted,

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*Counsel for the City of Los Angeles and  
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**CERTIFICATE OF SERVICE**

I, Robert M. Spalding, certify that on this 30th day of June, 2008, I caused to be served by hand and by electronic means through ECF as to E-Filing users, in compliance with Local Rule 5.5, a true and correct copy of the foregoing *Notice of Motion*, and *Instanter Motion for Leave to File Objections in Excess of 15 pages* to be served upon the following:

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Service was made by other means to:

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/s/ Robert M. Spalding  
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